

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CHERYL COMPTON, et al.,)
)
Plaintiffs,)
) **No. 4:11-CV-01975 CEJ**
v.)
)
ST. LOUIS METROPOLITAN POLICE)
DEPARTMENT, et al.,)
)
Defendants.)

JOINT PROPOSED SCHEDULING PLAN

COME NOW the parties, by and through counsel, and respectfully submit a Proposed Scheduling Plan pursuant to this Court's Order:

IT IS HEREBY ORDERED that the following schedule shall apply in this case, and will be modified only upon a showing of exceptional circumstances:

I. SCHEDULING PLAN

1. The Parties are in agreement that a Track 2 (Standard) assignment is appropriate.

2. All motions for joinder of additional parties or amendment of pleadings, including any motions for class certification, shall be filed no later than February 6, 2012.

3. Discovery shall proceed in the following manner:

(a) The parties shall make all disclosures required by Rule 26(a)(1), Fed.R.Civ.P., no later than January 23, 2012.

(b) Discovery shall not be conducted in phases or limited, except as set forth below.

(c) The following shall apply to the disclosure of expert testimony:

(1) Plaintiffs shall disclose all expert witnesses and shall provide the reports required by Rule 26(a)(2), Fed.R.Civ.P., no later than March 9, 2012, and shall make expert

witnesses available for depositions completed, no later than April 20, 2012. Plaintiffs shall disclose rebuttal experts and shall provide the reports required by Rule 26(a)(2), Fed.R.Civ.P., no later than June 29, 2012, and shall make rebuttal experts available for depositions completed, no later than July 27, 2012.

(2) Defendant shall disclose all expert witnesses and provide the reports required by Rule 26(a)(2), Fed.R.Civ.P., no later than April 27, 2012, and shall make expert witnesses available for depositions, and have depositions completed, no later than May 25, 2012.

(d) The presumptive limit of twenty-five (25) interrogatories per party as set forth in Rule 33(a), Fed.R.Civ.P., shall apply. Given the number of parties and complexity of issues, the presumptive limit of ten (10) depositions per side as set forth in Rule 30(a)(2)(A), Fed.R.Civ.P., shall not apply.

(e) Requests for physical or mental examinations of parties pursuant to Rule 35, Fed.R.Civ.P., may be sought; if so, any requests for physical or mental examinations must be made no later than April 27, 2012, and any exam must be completed by May 25, 2012.

(f) The parties do not presently anticipate any issues relating to disclosure or discovery of electronically stored information, including form or forms in which it should be produced.

(g) The parties shall complete all discovery in this case no later than August 15, 2012.

4. The parties intend to conduct settlement discussions at this time without the assistance of a mediator. If unsuccessful, the parties may seek to refer this case for alternative dispute resolution with the assistance of a mediator. If so, referral for alternative dispute resolution must be made no later than October 25, 2012, and that referral shall terminate on January 25, 2013.

5. Any motions to dismiss, motions for summary judgment, or motions for judgment on the pleadings must be filed no later than November 5, 2012. For any such motion(s) filed, any responses to the motion(s) shall be due December 5, 2012, and any reply memorandum in support shall be due December 20, 2012.

II. ORDER RELATING TO TRIAL

This action is deemed ready for jury trial May 13, 2013. It is anticipated that the length of time expected to try the case to verdict is seven (7) days.

Respectfully submitted,

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